

DOOLEY ROBERTS & FOWLER LLP
Suite 201, Orlean Pacific Plaza
865 South Marine Corps Drive
Tamuning, Guam 96913
Telephone No. (671) 646-1222
Facsimile No. (671) 646-1223
visosky@guamlawoffice.com

Attorneys for Defendants Garlock, Inc., Viacom, Inc.,
successor by merger to CBS Corporation, formerly known
as Westinghouse Electric Corporation, Foster Wheeler
Corporation, Bayer CropScience, Inc., as Successor-in-Interest
to Amchem Products, Inc., and The Dow Chemical Company

FILED
DISTRICT COURT OF GUAM

DEC 27 2005

MARY L.M. MORAN
CLERK OF COURT

**DISTRICT COURT OF GUAM
TERRITORY OF GUAM**

Cess Navarro Olmo,) CIVIL CASE NO. 05-00025
Ronnie Pascual Perreras,)
)

Plaintiffs,)
)

v.)

A.P. Green Industries, Inc., A.P. Green)
Services, Inc., A.W. Chesterton Company,)
Amchem Products, Inc., Armstrong World)
Industries, Inc., Asbestos Claims Management)
Corporation, Babcock & Wilcox Company,)
Combustion Engineering, Inc., Dow Chemical)
Company, Dresser Industries, Inc., Flexitalic,)
Inc., Flintkote Company, Foster Wheeler Corp.,)
GAF Corporation, Garlock, Inc., Georgia-)
Pacific Corporation, Harbison-Walker)
Refractories Co., Honeywell International, Inc.,)
John Crane, Inc., Kaiser Gypsum Company,)
Inc., Metropolitan Life Insurance Company,)
Owens Corning, Owens-Illinois, Inc., Pittsburg)
Corning Corporation, Quigley Company, Inc.,)
United States Gypsum Company, Viacom, Inc.)
)
Defendants)
)

ORIGINAL

Defendants Garlock, Inc. (Garlock), Viacom, Inc. (Viacom), and Foster Wheeler Corporation (Foster) answer the Cross-Claims of any and all other Defendants and Third-Party Defendants as follows:

1. Defendants Garlock, Viacom and Foster deny each and every Cross-Claim insofar as said allegations apply to Garlock, Viacom and Foster.
2. Defendants Garlock, Viacom and Foster deny any liability with respect to each and every count and every Cross-Claim insofar as said counts apply to Garlock, Viacom and Foster.
3. Defendants Garlock, Viacom and Foster deny that they are liable to indemnify any other Defendant or Third-Party Defendant in this action.
4. Defendants Garlock, Viacom and Foster deny that any Defendant or Third-Party Defendant is entitled to contribution from Defendants Garlock, Viacom and Foster in this action.
5. In response to each and every Cross-Claim, Defendants Garlock, Viacom and Foster adopt by reference all denials set forth in their Answer And Cross-Claims Of Defendants Garlock, Inc., Viacom, Inc., And Foster Wheeler Corporation, as though fully set forth herein.
6. In response to each and every Cross-Claim, Garlock, Viacom and Foster adopt by reference all defenses set forth in their Answer And Cross-Claims Of Defendants Garlock, Inc., Viacom, Inc., And Foster Wheeler Corporation, as though fully set forth herein, as defenses to each and every Cross-Claim.

PRAYER

WHEREFORE, Defendants Garlock, Viacom and Foster pray for judgment as follows:

1. That the Cross-Claims be dismissed with prejudice;

Cess Navarro Olmo, et. al. v. A.P. Green Industries, Inc., et. al.

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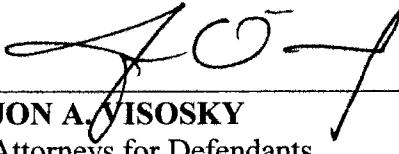
Answer to Cross Claims of Any and All Other Defendants

2. For costs of suit; and
3. For such further relief as the Court deems proper.

Dated December 27, 2005.

DOOLEY ROBERTS & FOWLER LLP

By:


JON A. VISOSKY
Attorneys for Defendants

Cess Navarro Olmo, et. al. v. A.P. Green Industries, Inc., et. al.

Civil Case No. 05-00025

Answer to Cross Claims of Any and All Other Defendants

CERTIFICATE OF SERVICE

I, Jon A. Visosky, caused the Answer To Cross-Claims Of Any And All Other Defendants And Third-Party Defendants, filed by Defendants Garlock, Inc., Viacom, Inc., and Foster Wheeler Corporation, to be served December 27, 2005, via hand delivery on the following:

Ignacio Aguigui, Esq.
LUJAN AGUIGUI & PEREZ LLP
300 Pacific News Building
238 Archbishop Flores Street
Hagåtña, Guam 96910
Attorneys for Plaintiffs

Anita P. Arriola, Esq.
ARRIOLA, COWAN & ARRIOLA
259 Martyr Street
Suite 201, C&A Professional Building
Hagåtña, Guam 96910
Attorneys for Owens-Illinois, Inc.

Thomas C. Sterling, Esq.
BLAIR, STERLING, JOHNSON, MOODY,
MARTINEZ & LEON GUERRERO
1008 Pacific News Building
238 Archbishop F.C. Flores Street
Hagåtña, Guam 96910
Attorneys for Metropolitan Life Insurance Company

J. Patrick Mason, Esq.
CARLSMITH BALL LLP
Bank of Hawaii Bldg., Suite 401
134 West Soledad Avenue
P.O. Box BF
Hagåtña, Guam 96932-5027
Attorneys for Georgia-Pacific Corporation, A.W. Chesterton Company, and
Kaiser Gypsum Company, Inc.

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Answer to Cross Claims of Any and All Other Defendants

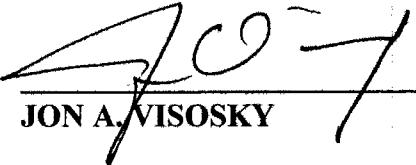
Louie J. Yanza, Esq.
MAHER · YANZA · FLYNN · TIMBLIN, LLP
115 Hesler Place, Ground Floor
Governor Joseph Flores Building
Hagåtña, Guam 96910
Attorneys for John Crane, Inc.

and via regular mail to all the parties listed on the attached matrix of Agents for Service of Process.

Dated December 27, 2005.

DOOLEY ROBERTS & FOWLER LLP

By:



JON A. VISOSKY

Cess Navarro Olmo, et. al. v. A.P. Green Industries, Inc., et. al.

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Answer to Cross Claims of Any and All Other Defendants

1) A.P. Green Industries, Inc. c/o CT Corporation System 120 S. Central Ave. Clayton, MO 63105-1705	8) Quigley Company, Inc. c/o CT Corporation System 111 Eighth Ave. New York, NY 10011-5201
2) A.P. Green Services, Inc. 30600 Telegraph Road Bingham Farms, MI 48025	9) United States Gypsum Company c/o Corporation Trust Co. 1209 N. Orange St. Wilmington, DE 19801-1120
3) Combustion Engineering, Inc. c/o Corporation Trust Co. 1209 N. Orange St. Wilmington, DE 19801-1120	
4) Dresser Industries, Inc. 4100 Clinton Dr. Houston, TX 77020	
5) Flexitallic, Inc. 6914 LaPorte Rd. Deer Park, TX 77436	
6) Harbison-Walker Refractories Co. c/o Corporation Trust Co. 1209 N. Orange St. Wilmington, DE 19801-1120	
7) Honeywell International, Inc. c/o Corporation Service Company 2711 Centerville Road, Suite 400 Wilmington, DE 19808	

and

Honeywell International, Inc.
101 Columbia Rd.
Morristown, NJ 07960